

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In Re:
Tarik K. Hassan)
Debtor.) Case #18-13743-BFK
Chapter 7
_____)

Debtor's Response to Trustee's Objection to Exemptions

1. On January 24, 2019, Debtor amended his schedules B and C to exempt 75% of all lost disposable earnings, pursuant to Code of Virginia, Section 34-29.

2. Trustee's objection with respect to the exemption of lost pre-petition disposable earnings in excess of 25% of the total amount therefore, awarded or settled, clearly contravenes the specific code language and should be overruled, under code of Virginia, Section 34-29..

3. Future lost wages are not proceeds of the estate pursuant to 11 USC, Section 541 (a)(16).

4. Debtor's personal injury claim is exempt under code of Virginia, Section 34-28.1.

5. Debtor's personal injury claim is currently unliquidated and unresolved..

6. No lawsuit has yet been filed accordingly, Debtor requests that:

(A) the trustee's objection be overruled, or

(B) the trustee's objection be continued until the claim has been liquidated and the specific damages to be compensated have been itemized by a settlement agreement or Court order of judgment.

Date: January 28, 2019

Tarik K. Hassan, Debtor
By Counsel

/s/John D. Sawyer

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Certificate of Service

I hereby certify that I have this 28th day of January, 2019, mailed or hand-delivered a true copy of the foregoing Response to:

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/s/ John D. Sawyer
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[Hassan.Response]